

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

PEDRO ROSAS, DANIEL AVELINO,)	
ALFREDO DURAN, and OSCAR GUTY,)	
on behalf of Themselves and All Others)	COLLECTIVE ACTION
Similarly Situated,)	
)	CASE NO. 3:13-CV-00724
Plaintiffs,)	
)	
v.)	
)	
TCI CONTRACTING, LLC <i>d/b/a</i> .)	
INSTALLED BUILDING)	
PRODUCTS OF NASHVILLE,)	
)	
Defendant.)	

**DEFENDANT’S MOTION FOR ADMISSION
PRO HAC VICE OF JOHN GERAK**

Defendant, TCI Contracting, LLC *d/b/a* Installed Building Products of Nashville, (“Defendant”), by its attorneys and pursuant to Local Rule 83.01(d), moves that John Gerak be admitted to practice before this Court on behalf of Defendant in the matter of *Pedro Rosas, Daniel Avelino, Alfredo Duran, and Oscar Guity, on behalf of Themselves and All Others Similarly Situated v. TCI Contracting, LLC d/b/a Installed Building Products of Nashville*. In support of this motion, Defendant states as follows:

John Gerak is an attorney at law and a shareholder in the law firm of Ogletree, Deakins, Nash, Smoak, & Stewart, P.C., 127 Public Square, Suite 4130, Cleveland, Ohio, 44114. Mr. Gerak is a member in good standing of the bar of State of Ohio. A Certificate of Good Standing from the U.S. District Court Northern District of Ohio, Eastern Division is attached hereto as Exhibit A.

Mr. Gerak is not a resident of this district and does not maintain an office in this district. Mr. Gerak is not currently, nor has he ever been, suspended, disciplined, or disbarred from any court.

Should this motion be granted, Mr. Gerak will, in good faith, be bound and will, in all respects, abide by the rules and regulations of this Court as to any and all matters arising during or pertaining to the above-entitled cause, and will subject and submit himself to the full disciplinary powers of this Court.

WHEREFORE, Defendant respectfully moves for admission before this Court of John Gerak for the purpose of representing Defendant in this matter.

Respectfully submitted,

/s/ Jonathan O. Harris

Jonathan O. Harris (TN BPR No. 26009)

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August, 2013, a copy of the above and foregoing Defendant's Motion for Admission Pro Hac Vice of John Gerak has been served on the following counsel of record via the Court's Electronic Filing/Notification System, and/or facsimile, and/or United States Mail, properly addressed and postage prepaid:

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/s/ Jonathan O. Harris

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